Message

From: Ayres, Sara [Ayres.Sara@epa.gov]

Sent: 9/18/2018 5:08:25 PM

To: Lischinsky, Robert [Lischinsky.Robert@epa.gov]; Duffy, Rick [Duffy.Rick@epa.gov]; Segall, Martha

[Segall.Martha@epa.gov]

Subject: FW: Current Version of the Guidance Memorandum

Attachments: Guidance for Incorporating 2018 Wehrum Reclassification Memorandum in Applicability Determinations 8 20

18.docx; 2018 Wehrum Memo Guidance One Pager.docx

Importance: High

Here is the latest draft memo and the updated one pager. Let me know if you need anything else, or if these are ready to go to Laurice for attachment to the agenda for tomorrow. Thanks.

Sara Ayres
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(312) 353-6266

From: Dalcher, Debra

Sent: Tuesday, September 18, 2018 11:53 AM

To: Ayres, Sara <Ayres.Sara@epa.gov>

Cc: Lamason, Bill < Lamason.Bill@epa.gov>; Torres, Elineth < Torres.Elineth@epa.gov>

Subject: Current Version of the Guidance Memorandum

Importance: High

Sara,

Just FYI, this version has already went to David Harlow for approval on the co-signature issue and also on the actual content of the document. We now have approval to start the signature process and if any substantive changes are made we will have to go through the approval process again. No changes have been made to the document since you sent it to me with the exception of a couple of minor edits by Sonja Rodman before we started the staffing process here. Bill Lamason has asked me to let you know we have the green light and need to move on this sooner rather than later.

Please let us know as soon as you are ready to go.

Thank you, Debra

From: Eck, Janet

Sent: Saturday, September 15, 2018 7:23 PM **To:** South, Peter < South, Peter@epa.gov>

Cc: Koerber, Mike < Koerber. Mike@epa.gov>; Thompson, Fred < Thompson. Fred@epa.gov>; Lamason, Bill < Lamason. Bill@epa.gov>; Dalcher, Debra < dalcher.debra@epa.gov>; Torres, Elineth < Torres. Elineth@epa.gov>

Subject: Issue for Monday 1-on-1 with OAR-IO Due Friday at 4:00 pm

Hi Pete, Please add this topic to the list of discussion topics for the Monday 9/17, 1-on-1 w/OAR. We submitted this topic for the previous 8/20 meeting and again for the 9/4 meeting, but have not received any feedback.

Referencing the 2018 Bill Wehrum Reclassification Memorandum in MACT Applicability Determinations as to the Plain Language Reading of CAA 112: OAQPS and OECA co-wrote guidance to assist EPA's Regional offices in determining when it is appropriate to reference or incorporate information from the 2018 Bill Wehrum memorandum into either the analysis supporting an Applicability Determination (AD) request or the AD itself. Use of the guidance will ensure consistency and legal accuracy across EPA in preparing MACT applicability determination responses referencing the 2018 Bill Wehrum Reclassification Memorandum. OECA has requested the guidance be co-signed at the AA level by both OAR and OECA. The guidance is in final draft, has been reviewed by OGC (Scott Jordan, Sonja Rodman) and is attached for review. Requesting concurrence on co-signature and guidance on moving this document forward for distribution to the Regional offices. Contact in OAQPS: Bill Lamason or Debra Dalcher; Contact in OECA: Sara Ayres.

Thanks.